

TECHNICAL REVIEW DOCUMENT FOR RENEWAL OF OPERATING PERMIT 98OPWE204

to be issued to:

Nutri-Turf, Inc.
Weld County
Source ID 1230497 Nutri-Turf, Inc.
Weld County
Source ID 1230497

Cathy Rhodes
November, 2003

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued October 1, 1999 and expires on October 1, 2004. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted October 1, 2003. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This facility is an auxiliary operation of the Anheuser-Busch, Inc., Fort Collins Brewery. A portion of the brewery wastewater is piped to this site for land application. The land is irrigated through center pivots with wastewater so that soil bacteria can break down the soluble organics and the vegetation can utilize the water and the nutrients. The production of brome grass, alfalfa, other grasses, wheat, and corn is sold. The Brewery is undergoing review under Operating Permit 95OPLR064.

This facility is located on County Road #15, in Weld County. The area is classified as an attainment area for all pollutants. The landfarm is not subject to the Accidental Release Program provisions of 112(r). Wyoming is an affected state within 50 miles of the facility. There are two Federal Class I areas within 100 kilometers of the facility: Rocky Mountain National Park and Rawah National Wilderness Area.

Facility wide emissions are as follows (tons per year):

<u>Pollutant</u>	<u>Actual</u>	<u>Potential</u>
VOC	110.0	236.0

Potential emissions are based on permitted levels.
Actual emissions are based on the most recent AIRS inventory data.

Emissions associated with the Brewery are:

<u>Pollutant</u>	<u>Potential (TPY)</u>	<u>Actual (TPY)</u>
Particulate Matter (PM)	193	8
PM ₁₀	193	8
Nitrogen Oxides (NO _x)	544	73
Sulfur Dioxide (SO ₂)	1410	<1
Volatile Organic Compounds (VOC)	215	66
Carbon Monoxide (CO)	100	18

Potential emissions are based on permitted emission levels. Actual emissions are based on the most recent AIRS inventory data.

This source does not emit major amounts of any Hazardous Air Pollutants.

II. Discussion of Modifications Made

Source Requested Modifications

The permittee did not request any revisions to the Operating Permit in their renewal application.

Other Modifications

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Nutri-Turf, Inc. Operating Permit:

Section I

Condition 1.4 is revised to add Section IV, Condition 3.g to the list of state-only provisions.

Condition 5 is added for compliance assurance monitoring (CAM) provisions.

Section II

Condition 2.2 is removed. The compliance reports in Appendices B and C require certification that insignificant activities meet all applicable requirements. A separate statement is not necessary.

Condition 4 is removed. This condition related reporting of commencement of new activities/construction under the PSD modification. The reporting requirement has been met.

Section III

The title of Condition 1 is revised.

Section IV – General Conditions

Revise Condition 3.g to indicate that it is a state-only provision.

Insert “and” between the Regulation No. 3 and the C.R.S. citations in Condition 4.

Update the Open Burning Regulation cite for Condition 17.

Appendices

The EPA addresses in Appendix D are updated.